

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 18-13219-amc
Ron Johnson	:	Chapter 13
Debtor	:	
	:	
MTGLQ Investors, LP c/o Rushmore Loan	:	
Management Services	:	
Movant	:	
vs.	:	
	:	
Ron Johnson	:	
	:	
Debtor/Respondent	:	
and	:	
William C. Miller, Esquire	:	
Trustee/Respondent	:	

OBJECTION TO CONFIRMATION OF THE PLAN

Movant, MTGLQ Investors, LP c/o Rushmore Loan Management Services (“Movant”), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtor, Ron Johnson (“Debtor”), as follows:

1. As of the bankruptcy filing date of May 14, 2018, Movant holds a secured Claim against the Debtor’s property located at 4 Olympia Ave., New London, PA 19390.
2. On July 20, 2018 Movant filed a Proof of Claim citing a secured, total debt claim in the amount of \$310,347.28.
3. The Plan currently proposes payment to Movant in the amount of \$212,395.00 for the secured claim.
4. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).
5. The Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.
6. The Plan fails to indicate that the Debtor will be responsible for the payment of post-petition taxes and insurance payments which may come due.

7. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtor is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

WHEREFORE, Movant respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Respectfully submitted,

Dated: 07/20/2018

s/Danielle Boyle-Ebersole, Esquire
Danielle Boyle-Ebersole, Esquire
Hladik, Onorato & Federman, LLP
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North Wales, PA 19454
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**CERTIFICATE OF MAILING OF OBJECTION TO THE PROPOSED
PLAN TO PARTIES IN INTEREST**

I, Danielle Boyle-Ebersole, Esquire, attorney for MTGLQ Investors, LP c/o Rushmore Loan Management Services (“Movant”), certify that I served a copy of the attached Objection to the Plan to the parties below on 07/20/2018:

Lewis P Hannah, Esquire
Via ECF
Attorney for Debtor

William C. Miller, Esquire
Via ECF
Trustee

Ron Johnson
33 Maple Street
Marcus Hook, PA 19061
Via First Class Mail

Debtor

Date: 07/20/2018

Respectfully Submitted,
s/Danielle Boyle-Ebersole, Esquire
Danielle Boyle-Ebersole, Esquire
Hladik, Onorato & Federman, LLP
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North Wales, PA 19454
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